

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In re:

**Alice Jean Vasko**

Debtor

Case No. 17-13957-BFK  
Chapter 13

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**MOTION TO EXTEND THE AUTOMATIC STAY**

The Debtor, Alice Jean Vasko, by Counsel, pursuant to 11 U.S.C. § 362(c)(4)(B), hereby requests that this Court enter an order for the extension of the automatic stay provided for under 11 U.S.C. § 362(a) as to all creditors. In support of this motion, the Debtor states as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. § 105(a), 28 U.S.C. § 157(b)(1), and 28 U.S.C. § 1334.
2. This is a core proceeding as defined by 28 U.S.C. § 157(b)(2).
3. Within the twelve months prior to the said filing date, the Debtor was in an active Chapter 13 case, Number 16-14014-BFK, filed November 28, 2016. On October 17, 2017, this Court entered a Local Bankruptcy Rule Order Dismissing Case.
4. The Debtor filed the current petition for relief under Chapter 13 on November 20, 2017.
5. The Debtor filed the current petition with the primary intention of stopping a foreclosure.
- 6. The Debtor has filed the current case in good faith.**
7. The Debtor is willing and able to fully perform the terms of a confirmed Chapter 13 Plan in the pending case.
8. This motion is not made for purposes of frustration or delay.

WHEREFORE, and for the foregoing reasons, the Debtor respectfully requests pursuant to § 362(c)(3)(B) that this Honorable Court order the extension of the automatic stay as provided

for under 11 U.S.C. § 362(a) as to all creditors, for the duration of the current chapter 13 case or until further order of this court.

Date: November 27, 2017

ALICE JEAN VASKO  
By Counsel

NEW DAY LEGAL, PLLC

By: /s/ John C. Morgan  
John C. Morgan, Esquire, VSB # 30148  
Suad Bektic, Esquire, VSB # 90012  
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*Counsel for the Debtor*

#### **CERTIFICATE OF SERVICE**

Pursuant to Local Bankruptcy Rule 9013-1, I hereby certify that on November 27, 2017, I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the Debtor, Chapter 13 trustee, and to all creditors or parties in interest who have requested notices in the case.

/s/ John C. Morgan  
John C. Morgan